

**SALLY ALMOND, P.E.**  
*Sr. EHS Specialist*

ROCKWOOD PLANT  
199 TRUCK RT.  
P.O. BOX 5  
ROCKWOOD, TN 37854

WWW.HORSEHEAD.NET  
SALMOND@HORSEHEAD.NET

P 865.354.2544  
F 865.354.2167

**HORSEHEAD**

*Leading the World in Zinc Recycling*

SOP-0039  
6MDa -  
VMS -

February 25, 2011

Mr. Jojin Janjic  
State of Tennessee Department of Environment  
and Conservation  
Division of Water Pollution Control  
401 Church Street  
L & C Annex, 6th Floor  
Nashville, TN 37243-1534

**RECEIVED**

**MAR 07 2011**

TN Division Of Water  
Pollution Control

RE: Horsehead Corporation – Rockwood, Tennessee  
Permit No. SOP 01-039

Dear Mr. Janjic:

Thank you again for the opportunity to meet with you and Gary Davis to discuss the status of our operating permit and allowing us to submit a renewal permit application for SOP 01-039.

Tim Basilone advised me that he and Mr. Davis discussed our comments regarding the existing operating permit on the telephone the day following our meeting, and that Mr. Davis was going to address relevant comments and publish a draft permit for public comment as soon as possible. We appreciate your prompt attention to our permit application.

We will develop a plan for use of iron rich material (IRM) in a demonstration project at the site to develop information on the viability of its use in a passive system for removing metals constituents and raising the pH of runoff water. You indicated that based on our conceptual description of the system, which is similar to the use of IRM in the Superfund project at our Palmerton, PA facility, permitting this project was not necessary since there was no off-site discharge of the surface water and that we use the water in our industrial process. Gary encouraged our continued effort on this project. We plan to provide a copy of our plan to you for your understanding of the project, and share the results with you.

We understand that as part of the permitting process it will be required that a geotechnical study is performed on the flank of the pond which was placed to create the (former) railroad bed some time ago. A road passes over this area now, the railroad tracks were removed prior to Horsehead occupying the property. Placement of the railroad bed closed the down dip portion of the valley, creating the pond.

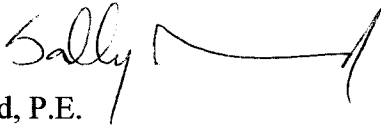
Enclosed are recent water sample analytical results for quadrant D in Moon Springs Pond. All results with the exception of lead are within allowable limits. The dissolved lead concentration (0.0162 mg/l) was slightly above the permitted limit of 0.015 mg/l. Another sample will be

collected and analyzed from the pond during the first quarter of 2011 to confirm or deny these results. At the time of this sampling there was not a qualifying rain event for the collection of stormwater runoff. This will be completed as soon as possible.

Attached is an authorization letter signed by our CEO, Jim Hensler, which delegates authority to the Site Manager to execute correspondence to the regulatory agencies. Mr. Davis had asked that we provide a copy of this letter.

Once again, thank you for meeting with us and addressing our permit requirements in a timely manner. Please call me or Tim Basilone if you have any questions or would like to discuss the permit. Tim can be contacted at 724-733-2223.

Yours truly,

A handwritten signature in black ink, appearing to read "Sally", followed by a long horizontal stroke and a small upward tick at the end.

Sally Almond, P.E.

cc. J.A. Goddard  
T.R. Basilone

Encls.

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Department of Water  
Control



Lab No. 1101-7001-1

Date Rec'd. 01/07/11

Date Sampled 01/07/11

Sampled by CLIENT

1138 MCGHEE LANE, SUITE 2  
JACKSBORO, TN 37757  
423-562-1934

HORSEHEAD RESOURCE DEV.CO.  
P.O. BOX 5  
ROCKWOOD, TN 37850

POND QUAD D

9:15 AM  
TYPE OF SAMPLE: WATER

Parameter	Final Result	Units	Test Method	MDL	Date	Time Tech
Arsenic (As), Total	<0.00125	mg/l	EPA 200.7	0.00125	01/18/11	15:21 OSL
Iron (Fe), Total	0.385	mg/l	EPA 200.7	0.00750	01/18/11	15:21 OSL
Nickel (Ni), Dissolved	<0.00100	mg/l	EPA 200.7	0.00100	01/18/11	16:25 OSL
Lead (Pb), Dissolved	0.0162	mg/l	EPA 200.7	0.00100	01/18/11	16:25 OSL
Mercury (Hg), Dissolved	<0.000200	mg/l	EPA 245.1	0.000200	01/18/11	16:00 OSL
Silver (Ag), Total	<0.00125	mg/l	EPA 200.7	0.00125	01/18/11	15:21 OSL
Zinc (Zn), Total	2.43	mg/l	EPA 200.7	0.00250	01/18/11	15:21 OSL
Cadmium (Cd), Dissolved	0.00407	mg/l	EPA 200.7	0.00100	01/18/11	16:25 OSL
Chromium (Cr), Dissolved	0.00306	mg/l	EPA 200.7	0.00100	01/18/11	16:25 OSL
Copper (Cu), Total	0.00811	mg/l	EPA 200.7	0.00100	01/18/11	15:21 OSL
Selenium (Se), Total	0.00468	mg/l	EPA 200.7	0.00250	01/18/11	15:21 OSL

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T. FE & T. ZN DETECTED IN THE ASSOCIATED METHOD BLANK.

T.AS, T.FE & D. CR RESULTS ARE AN ESTIMATED QUANTITY, BUT THE RESULTS MAY BE BIASED HIGH.

T. FE SURROGATE RECOVERIES NOT CALCULATED DUE TO MATRIX INTERFERENCE AND RESULTING SAMPLE DILUTION.

Respectfully Submitted

JAMES M. HENSLER  
*President and Chief Executive Officer*

4555 STEUBENVILLE PIKE  
SUITE 405  
PITTSBURGH, PA 15205

WWW.HORSEHEAD.NET  
JHENSLE@HORSEHEAD.NET

724.773.2200  
412.723.1912

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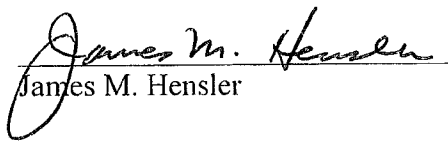
**To:** Ali Alavi, Secretary

**Date:** January 21, 2011

**From:** James M. Hensler, President & CEO

**Subject:** Delegation of Signature Authority

Pursuant to Article IV, Section 7 of the By-Laws of Horsehead Corporation, I hereby authorize the Vice President – Environmental Affairs or the appropriate Site Manager, to execute on my behalf for Horsehead Corporation, periodic environmental reports or responses to environmental agency inquiries where the relevant and appropriate laws or regulations require or may require the signature of a corporate officer.

  
James M. Hensler

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